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Attorneys for Plaintiff
TS-Optics Corporation

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TS-OPTICS CORPORATION,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 8:24-cv-01974-DOC-DFM

**PLAINTIFF'S REPLY TO
DEFENDANT'S
COUNTERCLAIMS**

JURY TRIAL DEMANDED

RUSS, AUGUST & KABAT

Plaintiff TS-Optics Corporation (“TS-Optics”) hereby replies to Defendant Microsoft Corporation’s (“Microsoft”) Counterclaims as follows:

PARTIES

1. Admitted.

2. Admitted.

JURISDICTION AND VENUE

3. Denied.

4. Admitted that this Court has jurisdiction to hear counterclaims related to TS-Optics’ allegations. Denied that Microsoft has any such claims or has properly pled such claims.

5. Admitted that this Court has jurisdiction to hear counterclaims related to TS-Optics’ allegations. Denied that Microsoft has any such claims or has properly pled such claims.

6. Admitted that this Court is the proper venue to hear counterclaims related to TS-Optics’ allegations. Denied that Microsoft has any such claims or has properly pled such claims.

COUNT I (Declaratory Judgment of Noninfringement of the ’055 Patent)

7. TS-Optics realleges and incorporates by reference the replies in Paragraphs 1-6 of its Reply.

8. Admitted as to TS-Optics’ allegations. Otherwise, denied.

9. Admitted that TS-Optics alleges infringement and that Microsoft purports to deny the allegation. Otherwise, denied.

10. Denied.

11. Denied.

COUNT II (Declaratory Judgment of Invalidity of the ’055 Patent)

12. TS-Optics realleges and incorporates by reference the replies in Paragraphs 1-11 of its Reply.

13. Admitted as to TS-Optics’ allegations. Otherwise, denied.

14. Admitted that TS-Optics alleges infringement and invalidity, and that Microsoft purports to deny the allegations. Otherwise, denied.

15. Denied.

16. Denied.

COUNT III (Declaratory Judgment of Noninfringement of the '709 Patent)

17. TS-Optics realleges and incorporates by reference the replies in Paragraphs 1-16 of its Reply.

18. Admitted as to TS-Optics' allegations. Otherwise, denied.

19. Admitted that TS-Optics alleges infringement and that Microsoft purports to deny the allegation. Otherwise, denied.

20. Denied.

21. Denied.

COUNT IV (Declaratory Judgment of Invalidity of the '709 Patent)

22. TS-Optics realleges and incorporates by reference the replies in Paragraphs 1-21 of its Reply.

23. Admitted as to TS-Optics' allegations. Otherwise, denied.

24. Admitted that TS-Optics alleges infringement and invalidity, and that Microsoft purports to deny the allegations. Otherwise, denied.

25. Denied.

26. Denied.

PRAYER FOR RELIEF

WHEREFORE, TS-Optics prays for the following relief with respect to Microsoft's counterclaims:

A. A dismissal with prejudice of Microsoft's counterclaims;

B. An adjudication that Microsoft is not entitled to any relief on its counterclaims, including, without limitation, any fine or damages; and

C. Costs and such further relief to which TS-Optics is entitled, and which the Court deems just and equitable.

DEMAND FOR JURY TRIAL

TS-Optics demands a trial by jury on all issues so triable.

DATED: December 17, 2024

Respectfully submitted,

/s/ Benjamin T. Wang

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CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2024, I electronically filed the foregoing document with the Clerk of the Court for the Central District of California using the ECF System which will send notification to the registered participants of the ECF System as listed on the Court's Notice of Electronic Filing.

/s/ Reza Mirzaie
Reza Mirzaie

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